

EXHIBIT A

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Paul J. Manafort, Jr.	2/22/18	Criminal Acts	On February 22, 2018, a federal grand jury in the Eastern District of Virginia returned an indictment by the Special Counsel against Manafort on counts related to false individual income tax returns, failure to file reports of foreign bank and financial accounts, bank fraud conspiracy, and bank fraud.	Superseding Indictment, United States of America v. Paul J. Manafort Jr. and Richard W. Gates III, No. 1:18 Cr. 83 (TSE)(S-1) (E.D. Va.).	https://www.justice.gov/file/1038391/download
	7/9/18	Background Information	A search and seizure warrant was executed on Manafort's Alexandria, Virginia residence on August 8, 2017. A multi-page list details seized items, including DVD disks. ECF No. 340-1 Page 4.	Notice of Submission, United States of America v. Paul J. Manafort Jr., No. 17-201-1 (ABJ) (D.D.C.), ECF No. 340 and 340-1.	
	8/21/18	Proceeding Updates	Manafort was convicted on eight counts after a trial in the Eastern District of Virginia.	Sharon LaFraniere, <i>Paul Manafort, Trump's Former Campaign Chairman, Guilty of 8 Counts</i> , N.Y. Times (Aug. 21, 2018).	https://www.nytimes.com/2018/08/21/us/politics/paul-manafort-trial-verdict.html
	9/14/18	Criminal Acts	On September 13, 2018 in a proceeding in the District Court for the District of Columbia, Manafort pled guilty to conspiracy against the United States (conspiracy to commit money laundering, tax fraud, failing to file Foreign Bank Account Reports and violating the Foreign Agents Registration Act, and lying and misrepresenting to the Department of Justice) and conspiracy to obstruct justice (witness tampering).	Plea Agreement, United States of America v. Paul J. Manafort Jr., No. 17-201-1 (ABJ) (D.D.C.), ECF No. 422.	https://www.justice.gov/file/1094151/download
	9/14/18	Criminal Acts	The statement of the offense associated with Manafort's guilty plea details the activities in which Manafort engaged as part of a conspiracy to violate FARA. ¶¶ 2-35.	Statement of the Offenses and Other Acts, United States of America v. Paul J. Manafort Jr., No. 17-201-1 (ABJ) (D.D.C.), ECF No. 423.	https://www.justice.gov/file/1094156/download
	9/14/18	Criminal Acts	Manafort's lobbying work for the Government of Ukraine, President Yanukovich, the Party of Regions, and the Opposition Bloc continued from 2006 to 2015. ¶ 4, ¶¶ 5-32. After being contacted by the FARA Unit regarding this work Manafort responded with false and misleading communications. ¶¶ 33-35.	<i>Id.</i>	

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Paul J. Manafort, Jr. (cont'd.)	9/14/18	Criminal Acts	Documents seized from Manafort's home in the summer of 2017 are attached to the statement of offense as exhibits. ¶ 35.	<i>Id.</i>	
	2/23/19	Proceeding Updates	Manafort is scheduled to be sentenced in the District Court for the District of Columbia for FARA-related crimes on March 13, 2019. In support of its sentencing memorandum, the government released 577 pages of trial exhibits. These exhibits detail correspondence, activities, and transactions conducted by Manafort in furtherance of his criminal schemes, including violations of FARA. They also detail many of the items seized from Paul Manafort, such as DVDs and "thumb drives."	Attachment G to Government's Sentencing Memorandum, United States of America v. Paul J. Manafort Jr., No. 17-201-1 (ABJ) (D.D.C.), ECF No. 525-2.	
	3/7/19	Proceeding Updates	Manafort was sentenced in the Eastern District of Virginia to 47 months for bank and tax fraud.	Sharon LaFraniere, <i>Paul Manafort Is Sentenced to Less Than 4 Years in 1 of 2 Cases Against Him</i> , N.Y. Times (Mar. 7, 2019).	https://www.nytimes.com/2019/03/07/us/politics/paul-manafort-sentencing.html

Richard W. Gates III	2/23/18	Criminal Acts	On February 22, 2018, a federal grand jury returned an indictment against Gates in the Eastern District of Virginia on counts related to false individual income tax returns, failure to file reports of foreign bank and financial accounts, bank fraud conspiracy, and bank fraud.	Superseding Indictment, United States of America v. Paul J. Manafort Jr. and Richard W. Gates III, No. 1:18 Cr. 83 (TSE)(S-1) (E.D. Va.).	https://www.justice.gov/file/1038391/download
	2/23/18	Criminal Acts	On February 23, 2018, Gates pled guilty in the District Court for the District of Columbia to conspiracy to violate FARA, among other crimes.	Plea Agreement, United States of America v. Richard W. Gates III, No. 17-201-2 (ABJ) (D.D.C.), ECF No. 205.	https://www.justice.gov/file/1038801/download
	2/23/18	Criminal Acts	The statement of criminal offense attached to Gates's guilty plea includes details regarding Gates' lobbying for Ukrainian entities between 2012 and 2016. ¶¶ 6-15.	Statement of the Offense, United States of America v. Richard W. Gates III, No. 17-201-2 (ABJ) (D.D.C.), ECF No. 206.	https://www.justice.gov/file/1038806/download
	9/14/18	Criminal Acts	Further details regarding Gates's lobbying activities in conjunction with Paul Manafort became public in a statement of offense attached to Manafort's guilty plea.	Statement of the Offenses and Other Acts, United States of America v. Paul J. Manafort Jr., No. 17-201-1 (ABJ) (D.D.C.), ECF No. 423.	https://www.justice.gov/file/1094156/download

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Skadden, Arps, Slate, Meagher, & Flom LLP	1/15/19	Background Information	In the spring of 2012, the Ukraine Ministry of Justice (MOJ), with the assistance of Paul Manafort, hired Skadden to write a report on the 2011 prosecution and trial of former Prime Minister Yulia Tymoshenko and to make assessments regarding its fairness. Appendix ¶ 4.	Settlement Agreement between Skadden Arps Slate Meagher & Flom LLP and U.S. Department of Justice (Jan. 15, 2019).	https://www.justice.gov/opa/press-release/file/1124381/download
	1/15/19	Criminal Acts	On January 15, 2019, Skadden settled with the U.S. Department of Justice for \$4.7 million, the amount that it had received for its lobbying work, and agreed to retroactively register under FARA. Skadden also admitted to having made false and misleading statements to the DOJ FARA Unit in response to an inquiry made in 2013. If Skadden continues to abide by the terms of the agreement, the DOJ will not pursue any further action against the firm.	<i>Id.</i>	
	1/15/19	Criminal Acts	The Appendix to the Settlement Agreement covers in detail how Skadden's lobbying work was performed between 2012 and 2013, as well as Skadden's submission of false statements and documents to the Department of Justice in early 2013 that misrepresented the law firm's obligations to register under FARA. Appendix ¶¶ 4-83.	<i>Id.</i>	

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Alex van der Zwaan	2/20/18	Background Information	Alex van der Zwann is an English lawyer previously employed at Skadden Arps Slate Meagher & Flom LLP. ¶ 2.	Statement of the Offense, United States of America v. Alex van der Zwaan, No. 18-31 (ABJ) (D.D.C.), ECF No. 9.	https://www.justice.gov/file/1036406/download
	2/20/18	Criminal Acts	In 2012, van der Zwaan assisted Skadden in the preparation and dissemination of a report concerning the trial of Yulia Tymoshenko. ¶ 1.	<i>Id.</i>	
	2/20/18	Criminal Acts	On November 3, 2017, van der Zwaan was interviewed by the Special Counsel's office. During this interview he made false statements to investigators about his contacts with Richard Gates and Paul Manafort. ¶¶ 5-7	<i>Id.</i>	
	2/20/18	Criminal Acts	On February 14, 2018, Alex van der Zwaan pled guilty to making false statements to investigators about his work in preparing a report on behalf of the Ukrainian government during his employment with Skadden. His plea agreement stated that he would "not be further prosecuted criminally . . . [for] any violations of the Foreign Agent Registration Act."	Plea Agreement, United States of America v. Alex van der Zwaan, No. 18-31 (ABJ) (D.D.C.), ECF No. 8.	https://www.justice.gov/file/1036401/download

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Konstantin Kilimnik	6/8/18	Background Information	Kilimnik oversaw the Kiev office of DMI, a political consulting group run by Paul Manafort. ¶ 7.	Superseding Indictment, United States of America v. Paul J. Manafort Jr. and Konstantin Kilimnik, No. 17-201-1 (ABJ) (D.D.C.), ECF No. 318.	https://www.justice.gov/sco/page/file/1070326/download
	6/8/18	Criminal Acts	On June 8th, 2018, a federal grand jury returned a third superseding indictment against Kilimnick, charging him with obstruction of justice.	<i>Id.</i>	
	6/8/18	Criminal Acts	From 2006 to 2014, Kilimnick assisted Manafort in a multimillion dollar lobbying campaign in the United States at the direction of Yanukovych, the Party of Regions, and the Government of Ukraine. ¶ 20.	<i>Id.</i>	
	6/8/18	Criminal Acts	In 2012, Kilimnik assisted Manafort when he secretly retained a group of former senior European politicians to take positions favorable to Ukraine, including by lobbying in the United States, on behalf of Yanukovych and the Party of Regions. ¶ 21.	<i>Id.</i>	

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Michael T. Flynn	11/30/17	Criminal Acts	On November 30, 2017, Flynn was indicted by the Special Counsel for making false statements to the FBI in a January 24, 2017 interview regarding contacts with the Russian Ambassador.	Information, United States of America v. Michael T. Flynn, No. 17-232 (RC) (D.D.C.), ECF No. 1.	https://www.justice.gov/file/1015026/download
	12/1/17	Criminal Acts	On December 1, 2017 Flynn pled guilty to making false statements to the FBI regarding contacts with the Russian Ambassador.	Plea Agreement, United States of America v. Michael T. Flynn, No. 17-232 (RC) (D.D.C.), ECF No. 3.	https://www.justice.gov/file/1015121/download
	12/1/17	Criminal Acts	Additionally, he admitted in his plea agreement that he made materially false statements and omissions in March 7, 2017 FARA filings related to a project performed by Flynn and the Flynn Intel Group. ¶ 5.	Statement of the Offense, United States of America v. Michael T. Flynn, No. 17-232 (RC) (D.D.C.), ECF No. 4.	https://www.justice.gov/file/1015126/download
	12/12/18	Criminal Acts	In the December 12, 2018 indictment of Flynn's former business partner Bijan Rafiekian and Turkish-Dutch businessman Ekim Alptekin, Flynn is described as "Person A."	Indictment, United States of America v. Bijan Rafiekian and Kamil Ekim Alptekin, No. 1:18-CR-457 (AJT) (E.D. Va.), ECF No. 1.	https://www.justice.gov/opa/press-release/file/1120621/download
	12/12/18	Criminal Acts	Flynn and Rafiekian were business partners in Flynn Intel Group, which preformed services for the Turkish government via Inovo BV, a Dutch company controlled by Alptekin. ¶¶ 1-3.	<i>Id.</i>	
	12/12/18	Criminal Acts	Flynn is mentioned over twenty times in connection to his telephone calls, emails, and text messages with Rafiekian and Alptekin. ¶¶ 8-50.	<i>Id.</i>	
	12/12/18	Criminal Acts	Flynn attended a meeting with two Turkish ministers in September 2016 in New York City. ¶ 28.	<i>Id.</i>	
	12/12/18	Criminal Acts	Following Flynn's op-ed in the Hill, the FARA Registration Unit of the US DOJ sent Flynn a letter requesting additional information to determine if Flynn, Flynn Intel Group, or others had an obligation to register under FARA. ¶ 51.	<i>Id.</i>	

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Bijan Rafiekian, a/k/a Bijan Kian		Background Information	Rafiekian is an Iranian-American businessman and former business partner of Michael Flynn. Rafiekian worked with the Flynn Intel Group starting in 2015.	Nicholas Confessore, Matthew Rosenberg and Danny Hakim, How Michael Flynn's Disdain for Limits Led to a Legal Quagmire, N.Y. Times (June 18, 2017).	https://www.nytimes.com/2017/06/18/us/politics/michael-flynn-intel-group-trump.html
	12/12/18	Background Information	Rafiekian served as the main point of contact between Flynn Intel Group and Alptekin, who acted as a go-between, during the firm's work for the Turkish government. ¶¶ 1-3.	Indictment, United States of America v. Bijan Rafiekian and Kamil Ekim Alptekin, No. 1:18-CR-457 (AJT) (E.D. Va.), ECF No. 1.	https://www.justice.gov/opa/press-release/file/1120621/download
	12/12/18	Criminal Acts	On December 17, 2018, the U.S. Attorney's Office for the Eastern District of Virginia and the Counterintelligence and Export Control Section, National Security Division, USDOJ indicted Rafiekian, charging him with FARA violations and with acting as a foreign agent. Page 17-19.	<i>Id.</i>	
	12/12/18	Criminal Acts	The indictment included details of email and Skype communications between Rafiekian and Aleptekin. ¶¶ 8-9.	<i>Id.</i>	
	12/12/18	Criminal Acts	Thirteen email messages from Rafiekian to Alptekin were described and quoted from.	<i>Id.</i>	
	12/12/18	Criminal Acts	Five email messages from Rafiekian to Flynn were described and quoted from. In addition to these communications, the indictment reveals that Rafiekian, Aleptekin, and Flynn met with two Turkish ministers in New York City in September 2016 and that Rafiekian lobbied a member of Congress, a Congressional staffer, and a state government official in September and October 2016. ¶¶ 28, 30.	<i>Id.</i>	
	12/12/18	Criminal Acts	The indictment details financial transactions between Rafiekian and Aleptekin related to the project. ¶ 25, 31-32, 34, 36, 38.	<i>Id.</i>	
	2/13/19	Proceeding Updates	On February 13, 2019, Judge Trenga postponed Bijan Kian's trial until July 2019.	Order, United States v. United States of America v. Bijan Rafiekian and Kamil Ekim Alptekin, Case No. 18-CR-457 (AJT) (E.D. Va. Feb. 13, 2019), ECF No. 48.	

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Kamil Ekim Alptekin		Background Information	Alptekin is a Turkish businessman and chairman of the Turkish-American Business Council.	Peter Baker and Matthew Rosenberg, <i>Michael Flynn Was Paid to Represent Turkey's Interests During Trump Campaign</i> , N.Y. Times (Mar. 10, 2017).	https://www.nytimes.com/2017/03/10/us/politics/michael-flynn-turkey.html?module=inline
	12/12/18	Background Information	Alptekin's firm, Inovo BV, was the conduit for funds to Flynn Intel Group from the Turkish government. Alptekin also acted as a communications channel between representatives of Flynn Intel Group and Turkish officials. ¶¶ 1-3.	Indictment, United States of America v. Bijan Rafiekian and Kamil Ekim Alptekin, No. 1:18-CR-457 (AJT) (E.D. Va.), ECF No. 1.	https://www.justice.gov/opa/press-release/file/1120621/download
	12/12/18	Investigation Update	On December 17, 2018, the U.S. Attorney's Office for the Eastern District of Virginia and the Counterintelligence and Export Control Section, National Security Division, U.S. DOJ indicted Alptekin, charging him with FARA violations and with acting as a foreign agent. Pages 17-19.	<i>Id.</i>	
	12/12/18	Criminal Acts	Alptekin was charged with four counts of making false statements to the FBI in a May 24, 2017 interview. Page 20.	<i>Id.</i>	
	12/12/18	Criminal Acts	Seven email messages and three Skype messages from Aleptekin to Rafiekian were described or quoted from.	<i>Id.</i>	
	12/12/18	Criminal Acts	The indictment reveals that Rafiekian, Aleptekin, and Flynn met with two Turkish ministers in New York City in September 2016. ¶ 28.	<i>Id.</i>	
	12/12/18	Criminal Acts	The indictment details false statements and omissions made by Aleptekin and Rafiekian to Flynn Intel Group's lawyers and on Flynn Intel Group's FARA registration statement and supplemental statement. ¶¶ 51-63.	<i>Id.</i>	

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Natalia V. Veselnitskaya	1/8/19	Criminal Acts	On January 8, 2019, Veselnitskaya was indicted in the Southern District of New York for obstructing justice in the course of the United States v. Prevezon Holdings litigation.	Indictment, United States of America v. Natalya Vladimirovna Veselnitskaya, 18-CR-904 (S.D.N.Y).	https://www.justice.gov/usao-sdny/press-release/file/1123676/download